## COMMENTS PERMIT INFORMATION SUMMARY PERCHED WATER REMOVAL ACTION

04/15/91

OEPA/DOE-FMPC 2 LETTER OU5



State of Ohio Environmental Protection Agency

Southwest District Office 40 South Main Street Dayton, Ohio 45402-2086 (513) 285-6357 FAX (513) 285-6249

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George V. Voinovich Governor

April 15, 1991

RE: COMMENTS

> PERMIT INFORMATION SUMMARY PERCHED WATER REMOVAL ACTION

Mr. Jack Craig U.S. DOE FMPC P.O. Box 398705 Cincinnati, Ohio 45239

Dear Mr. Craig:

The Wastewater Division has reviewed the Permit Information Summary for the Perched Water Removal Action and has the following comments and concerns.

- 1. What is the flow route for this wastewater after the plant 8 sump? If it flows to 602 (general sump) it should be noted that the anticipated chromium load from this system (0.004 kg/day is approximately 30% of the daily maximum allowable (0.013 kg/day) in the NPDES permit. concentration 233 ug/l is about twice the 602 concentration chromium limit (111 ug/l). It would seem wise to have this stream flow to a treatment tank at the general sump for lime settling prior to discharge to 001.
- Are there any other possible impacts of this discharge on 2. the NPDES permit?
- Has DOE considered an internal monitoring station for VOC's 3. to insure that BAT is operating properly?
- What is the chance of an explosive atmosphere forming 4. inside the collection tanks?
- Will the Plant 9 collection tank be covered? 5. diagram does not show a covered tank.
- If DOE wants to minimize the effect of TSS they should 6. consider using the collection tanks for maximum settling by not pumping off the bottom and diffusing the influent flows.
- 7. DOE should consider installing flow indicators on the two activated carbon filters trains (instead of on the feed pumps) to insure that the flow rate is not too high through Date Rec'd APR 1 7 1991 one side.

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If you have any questions about these comments please contact me.

Sincerely,

School Mittheel Graham E. Mitchell DOE Coordinator

GEM/bjb

cc: Kathy Davidson, OEPA
Jack Van Kley, Ohio AG's
Catherine McCord, USEPA
Lisa August, Geotrans
Ed Schuessler, PRC